Moose River Lumber Company, Inc.
Somerset County
Moose River, Maine
A-779-70-D-R/A

Departmental
Findings of Fact and Order
Part 70 Air Emission License
Renewal with Amendment

FINDINGS OF FACT

After review of the Part 70 License renewal and amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Moose River Lumber Company, Inc.
LICENSE TYPE	Part 70 License Renewal and Part 70 Minor License Modification
NAICS CODES	321113
NATURE OF BUSINESS	Lumber and Wood Products Manufacturer
FACILITY LOCATION	25 Tapley Road, Moose River, Maine

Moose River Lumber Company, Inc. (MRL) is a spruce and fir board lumber mill.

MRL has the potential to emit more than 100 tons per year (TPY) of carbon monoxide (CO) and more than 50 TPY of volatile organic compounds (VOC). Therefore, the source is a major source for criteria pollutants. MRL does not have the potential to emit 10 TPY or more of a single hazardous air pollutant (HAP) or 25 TPY or more of combined HAP. Therefore, the source is considered an area source for HAP.

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

Boilers

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (ton/hr)	Fuel Type, % moisture	Manuf. Date	Install. Date	Stack #
Boiler #1	15.3	1.0	wood, 15%	1988	1988	1
Boiler #2	4.5	0.5	wood/bark, 50%	1926	1979	2
Boiler #4	29.4	2.2	wood, 25%	2008	2008	4

The previously licensed Boiler #3 (25.1 MMBtu/hr, oil-fired) was taken off-line in February 2009 and removed from the site in 2011. It has therefore been removed from this license.

Generators

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Output (Hp)	Fuel Type, % sulfur	Manuf. Date	Install. Date
Generator #1	1.9	275	distillate fuel, 0.0015%	4/3/06	2010

Generator #1 was previously considered an insignificant activity per the appendices to 06-096 Code of Maine Rules (CMR) 140. However, changes to this rule removed this exemption and the generator is being added to this license through a Part 70 minor modification.

Process Equipment

Equipment	Max. Production Rate	Pollution Control Equipment
Drying Kilns (3)	98 million board feet per year	none
Pneumatic Conveying Systems	N/A	Cyclones

The previously licensed parts washer has been replaced with a unit that uses a solvent containing less than 5% VOC. This unit is considered an aqueous-based

parts washer. It does not meet the definition of solvent cleaning machine, and there are no applicable requirements in 06-096 CMR 130. Therefore, it is considered an insignificant activity and mentioned for completeness purposes only.

MRL has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended).

C. Definitions

Distillate Fuel means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396, diesel fuel oil numbers 1 or 2, as defined in ASTM D975, kerosene, as defined in ASTM D3699, biodiesel as defined in ASTM D6751, or biodiesel blends as defined in ASTM D7467.

D. Application Classification

MRL applied to renew their Part 70 license issued under 06-096 CMR 140 (as amended). In addition, MRL applied to incorporate the requirements for Generator #1, which was previously considered an insignificant activity, through a Part 70 Minor License Modification.

A Part 70 Minor License Modification is for a license change that meets the following criteria:

- Does not violate any Applicable requirement;
- Does not involve a Part 70 Significant License Modification to existing monitoring, reporting, or recordkeeping requirements in the license;
- Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impact or a visibility or increment analysis;
- Does not seek to establish or change a Part 70 license term or condition for which there is no corresponding underlying Applicable requirement, and that the source has assumed to avoid an Applicable requirement to which the source would otherwise be subject. Such terms and conditions include: A federally enforceable emissions cap assumed to avoid classification as a Title I modification or a modification or reconstruction under any provision of Section 111, or 112 of the Clean Air Act (CAA); and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
- Is not a Title I modification or a modification or reconstruction under any provision of Section 111 or 112 of the CAA, and

- Is not required by the Department to be processed under Part 70 Significant License Modification procedures.

The requests to incorporate the requirements for Generator #1 and clarify Compliance Assurance Monitoring (CAM) applicability are not Part 70 Significant License Modifications. The facility is not proposing substantial changes to existing monitoring and testing requirements, nor is it proposing the relaxation of existing license conditions (definition of Part 70 Significant Modification).

The facility's request is classified as a Part 70 Renewal with Part 70 Minor License Modification and has been processed under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (CMR) 140 (as amended).

E. Facility Description

MRL produces kiln-dried spruce and fir dimensional lumber at the Moose River facility. Logs are delivered by truck to the mill yard, some in either sawlog form, from 8 feet to 16 feet long, or in tree-length form, up to 50 feet long. Tree-length logs are moved to the slasher by cranes and then cut into sawlogs. Sawlogs pass through a scanner and are sorted into two hot-ponds for the two separate sawing lines and then are transferred by conveyors to two ring-debarkers. Bark, removed during the debarking process, is conveyed to a concrete storage area where a bucket loader is used to transfer the bark to trucks to be hauled offsite to customers.

The sawmill consists of two single-pass log breakdown lines, one for small logs and one for large logs. The line for smaller logs consists of a hew-saw, which has four chipping heads, and one group of horizontal saws. The line for larger logs consists of two chipping heads and two vertical band saws, which make the first cut. Blocks are then transferred to a horizontal gang saw with side chipping heads to be cut into planks. Sideboards go to an edger, which cuts the boards to acceptable specifications. All lumber is then fed to a trim-saw line, which trims the ends square in two-foot increments from 6-foot to 16-foot lengths. From the trim saw line the wood transfers to an automatic sorter, which separates the wood by width and length. Bundles of lumber are then stacked and moved into a storage yard area by forklifts before being transferred to the drying kilns.

Wood waste from the sawmill goes to a chipper, and the chips are conveyed to a storage bin where they are loaded onto trucks for delivery to outside customers. Sawdust is transferred by a blowing system to a storage building for combustion in either Boiler #1 or Boiler #4 or to a storage bin where it is loaded into trucks for transfer to various outside customers.

The majority of boards produced at the mill are kiln-dried in one of three kilns located at the mill. Two wood-fired boilers (Boilers #1 and #4) are used to provide heat for the kilns. Exhaust from the kilns is released to the atmosphere through multiple roof vents. Once dried, the lumber is transferred by forklift to the planer mill. Rough, dry lumber is fed through a planer machine. The finished lumber passes a grading station where it is visually graded.

After grading, trim saws trim for length and grade, and the lumber is then sorted and stacked in bundles approximately 4-foot wide by 3-foot high and from 6-foot to 18-foot lengths. Lumber packs are then placed in inventory awaiting shipment by truck to various customers along the northeast coast and also to a railroad reload facility to customers further south. Planer mill shavings are transferred by a blowing system to a storage silo for combustion in Boiler #1 or Boiler #4.

F. General Facility Requirements

MRL is subject to the following state and federal regulations listed below, in addition to the regulations listed for specific units as described further in this license.

CITATION	REQUIREMENT TITLE
06-096 CMR 101	Visible Emissions Regulation
06-096 CMR 102	Open Burning
06-096 CMR 103	Fuel Burning Equipment Particulate Emission Standard
06-096 CMR 105	General Process Source Particulate Emission Standard
06-096 CMR 106	Low Sulfur Fuel Regulation
06-096 CMR 109	Emergency Episode Regulations
06-096 CMR 110	Ambient Air Quality Standards
06-096 CMR 116	Prohibited Dispersion Techniques
06-096 CMR 137	Emission Statements
06-096 CMR 140	Part 70 Air Emission License Regulations
06-096 CMR 143	New Source Performance Standards
06-096 CMR 144	National Emission Standards for Hazardous Air Pollutants
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR part 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR Part 63, Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 CFR Part 70	State Operating Permit Programs

Note: CMR = Code of Maine Regulations
CFR = Code of Federal Regulations

G. Units of Measurement

The following units of measurement are used in this license:

BF	board feet
gal/hr	gallons per hour
Hp	horsepower
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
lb/ton	pounds per ton
MMBF	million board feet
MMBF/year	million board feet per year
MMBtu/hr	million British Thermal Units per hour
ton/hr	ton per hour
ton/year or tpy	tons per year

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. NO_X RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides, 06-096 CMR 138 (as amended) is applicable to sources that have the potential to emit quantities of NO_x equal to or greater than 100 tons/year. MRL's potential to emit NO_x is less than 100 ton/year. Therefore, 06-096 CMR 138 is not applicable to this facility.

C. VOC RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds, 06-096 CMR 134 (as amended) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year, except for exempt equipment or processes. MRL has VOC emission limits greater than 40 ton/year. However, indirect contact wood kilns are exempt when determining the facility's total VOC emissions for the purposes of 06-096 CMR 134. After excluding the kiln emissions, MRL is below the 40 ton/year threshold. Therefore, 06-096 CMR 134 is not applicable to this facility.

D. Mandatory Greenhouse Gas (GHG) Reporting

Federal regulation 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*, which contains GHG reporting and related monitoring and recordkeeping requirements, is applicable to the owners/operators of any facility which falls into any one of the following three categories, per 40 CFR Part 98, Subpart A, *General Provision*, § 98.2, *Who must report?*

(a)(1) A facility that contains any source category that is listed in Table A–3 of this subpart in any calendar year starting in 2010.

(a)(2) A facility that contains any source category that is listed in Table A–4 of this subpart and that emits 25,000 metric tons CO_2e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all applicable source categories that are listed in Table A–3 and Table A–4 of this subpart.

(a)(3) A facility that in any calendar year starting in 2010 meets all three of the conditions listed in this paragraph (a)(3). For these facilities, the annual GHG report must cover emissions from stationary fuel combustion sources only.

(i) The facility does not meet the requirements of either paragraph (a)(1) or (a)(2) of this section.

(ii) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hour or greater.

(iii) The facility emits 25,000 metric tons CO_2e or more per year in combined emissions from all stationary fuel combustion sources.

MRL does not contain any source categories listed in Tables A-3 or A-4 of 40 CFR Part 98, Subpart A.

Emissions of CO_2 from the combustion of biomass are excluded from paragraph (a)(3)(iii) above. Therefore, MRL does not meet all three conditions listed in paragraph (a)(3) above. Therefore, MRL is not required to fulfill the recordkeeping and reporting requirements of 40 CFR Part 98.

E. PSD/BACT Review

The Department issued Air Emissions License A-779-77-1-A on September 30, 2008 to MRL. The license was issued to permit construction of Boiler #4. The license was issued pursuant to federal Prevention of Significant Deterioration (PSD) requirements and the Department's air licensing requirements for major modifications.

F. Compliance Assurance Monitoring (CAM)

40 CFR Part 64, *Compliance Assurance Monitoring,* is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100 tons/year for any pollutant.

Boilers #1 and #4 use control equipment to meet emission limits for PM, and MRL's previous air emission license stated that these boilers were subject to CAM for PM. However, highly rated emission factors from EPA's AP-42, *Compilation of Air Pollutant Emission Factors* demonstrate pre-control emissions of PM are significantly less than 100 tons/year. Therefore, it has been determined that CAM does not apply to any emission units at the facility.

G. Boiler #1

Boiler #1 is also referred to as the "Industrial Boiler." It is used as a backup to Boiler #4 and to provide supplemental heat during the winter. Boiler #1 has a maximum heat input capacity of 15.3 MMBtu/hr and fires only kiln-dried planer mill shavings which have an average moisture content of 15%. It was manufactured and installed in 1988.

Emissions exit through Stack #1 which has an inside diameter of 24 inches and above ground level (AGL) height of 70 feet.

1. Emissions Inventory Approach

   MRL tracks fuel usage from Boiler #1 for use in estimating emissions as required by *Emission Statements*, 06-096 CMR 137. Previous testing has shown that, based on the moisture content of the wood and size of the auger, the feed auger for Boiler #1 typically delivers 3.18 lbs of wood per revolution. To determine Boiler #1's fuel usage, MRL shall keep records of auger turns.

2. New Source Performance Standards (NSPS)

   Boiler #1 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional*

Steam Generating Units, 40 CFR Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989. Boiler #1 was constructed prior to the applicability date of this rule.

3. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   Boiler #1 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63, Subpart JJJJJJ). It is considered an existing biomass-fired boiler. The requirements of this subpart are covered in a separate section below.

4. Control Equipment

   Emissions of particulate matter from Boiler #1 are controlled by a cyclone with fly ash re-injection.

5. Emission Limits and Streamlining

   For Boiler #1 a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.30 lb/MMBtu	06-096 CMR 103, §2(B)(4)(a)	0.30 lb/MMBtu
	4.59 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	4.59 lb/hr
PM_{10}	4.59 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	4.59 lb/hr
SO_2	0.38 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	0.38 lb/hr
NO_x	7.50 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	7.50 lb/hr
CO	9.18 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	9.18 lb/hr
VOC	0.58 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	0.58 lb/hr

Visible Emissions	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 101, §2(B)(1)(e)	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period

6. Emission Limit Compliance Methods

   Compliance with the emission limits associated with Boiler #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

7. Compliance Assurance Monitoring (CAM)

   MRL's previous air emission license stated that Boiler #1 was subject to CAM for PM. However, AP-42, Table 1.6-1 (dated 9/03) lists a PM emission factor from combustion of dry wood with no control as 0.40 lb/MMBtu. This results in estimated maximum uncontrolled emissions of PM from Boiler #1 of 26.8 tpy, well below the applicability threshold of 100 tpy. Therefore, it has been determined that CAM does not apply to this equipment.

8. Operational Limits

   As discussed above, Boiler #1 is primarily used as backup for periods when Boiler #4 is down for maintenance or when temperatures are extremely cold and supplemental heat is required. However, an Ambient Air Quality Analysis showed that, in order to comply with Maine Ambient Air Quality Standards (MAAQS) and Prevention of Significant Deterioration (PSD) Increment Standards, MRL must reduce the firing of Boiler #1 to 20% capacity or less, on a 24-hour basis, when Boiler #1 and Boiler #4 are fired in conjunction, except during periods of startup and shutdown when operations overlap is necessary. The 20% capacity limit equates to a daily fuel limit for Boiler #1 of 9,600 lb/day (4.8 ton/day) of wood.

   Previous testing has shown that the fuel auger delivers 7.6 lbs of wood per revolution when the auger is 100% full. However, the auger is typically operated at a fill level of 50% equating to 3.8 lbs of wood per revolution.

   To demonstrate compliance with the 20% capacity restriction, MRL operates and maintains an auger revolution counter on the fuel supply for Boiler #1. During periods when Boiler #1 is operated in conjunction with Boiler #4, MRL keeps a log of daily auger revolution counter readings, excluding periods of startup and shutdown, and converts the records to daily fuel use for Boiler #1.

9. Periodic Monitoring

MRL shall monitor and record the following periodic monitors for Boiler #1 and its associated air pollution control equipment.

a. Tons of wood fired in Boiler #1 on a monthly and 12-month rolling total basis based on auger rotations.
b. Records of all cyclone monthly inspections and any maintenance activities performed.
c. For periods when Boiler #1 is operated in conjunction with Boiler #4, records of the daily auger revolutions for the feed to Boiler #1 (excluding periods of startup and shutdown) and the resulting calculated quantity of fuel consumed in lb/day (or tons/day).

10. Parameter Monitors

There are no Parameter Monitors required for Boiler #1.

11. CEMS and COMS

There are no continuous emission monitoring systems (CEMS) or continuous opacity monitoring systems (COMS) required for Boiler #1.

H. Boiler #2

Boiler #2 is a dutch oven style boiler that was constructed on-site with a maximum heat input capacity of 4.5 MMBtu/hr. It combusts "hog" fuel which is made up of wood bark and other green wood scraps from the process with a moisture content averaging 50%. Boiler #2 was installed in 1979.

Boiler #2 was previously used for facility heating. However, these needs are now being met by Boilers #1 and #4. Boiler #2 was taken off-line and drained in April 2014. The stack for Boiler #2 has also been removed. Prior to re-starting Boiler #2, MRL must re-install the stack to the original AGL height of 90 feet.

1. Emissions Inventory Approach

MRL tracks fuel usage from Boiler #2 for use in estimating emissions as required by *Emission Statements*, 06-096 CMR 137. To determine fuel usage, MRL shall keep records of the hours of operation of Boiler #2 and assume 0.5 tons of fuel is consumed per hour of operation.

2. New Source Performance Standards (NSPS)

   Boiler #2 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 CFR Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989. Boiler #2 was constructed prior to the applicability date of this rule and is smaller than 10 MMBtu/hr.

3. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   Boiler #2 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63, Subpart JJJJJJ). It is considered an existing biomass-fired boiler. The requirements of this subpart are covered in a separate section below.

4. Emission Limits and Streamlining

   For Boiler #2 a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.30 lb/MMBtu	06-096 CMR 103 §2(B)(4)(a)	0.30 lb/MMBtu
	1.35 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	1.35 lb/hr
PM_{10}	1.35 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	1.35 lb/hr
SO_2	0.11 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	0.11 lb/hr
NO_x	0.99 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	0.99 lb/hr
CO	2.70 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	2.70 lb/hr
VOC	0.17 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	0.17 lb/hr
Visible Emissions	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 101, §2(B)(1)(e)	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period

5. Emission Limit Compliance Methods

   Compliance with the emission limits associated with Boiler #2 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

6. Periodic Monitoring

   MRL shall monitor and record the following periodic monitors for Boiler #2 and its associated air pollution control equipment.

   1. Records of operation of Boiler #2 including the dates and times of operation.
   2. Tons of wood fired in Boiler #2 on a monthly and 12-month rolling total basis based on the hours of operation and a fuel usage of 0.5 ton/hour.

7. Parameter Monitors

   There are no Parameter Monitors required for Boiler #2.

8. CEMS and COMS

   There are no continuous emission monitoring systems (CEMS) or continuous opacity monitoring systems (COMS) required for Boiler #2.

I. Boiler #4

Boiler #4 is also referred to as the "Hurst Boiler." It provides primary heat for the facility and to the drying kilns. Boiler #4 has a maximum heat input capacity of 29.4 MMBtu/hr and was manufactured and installed in 2008.

Boiler #4 fires a mix of kiln-dried planer mill shavings and green wood. The current mix is approximately 70% dry material (15% moisture) and 30% green material (50% moisture) for an effective moisture content of 25.5% and a heating value of 6705 Btu per pound of wood.

Emissions exit through Stack #4 which has an inside diameter of 30 inches and above ground level (AGL) height of 72 feet.

1. Emissions Inventory Approach

   MRL tracks fuel usage from Boiler #4 for use in estimating emissions as required by *Emission Statements*, 06-096 CMR 137. Since Boiler #4 fires

wood of varying moisture contents, the weight of fuel delivered per auger turn can change. A typical mix of 70% dry/30% green results in a delivery rate of 5.98 lbs of wood per revolution. To determine Boiler #4's fuel usage, MRL shall keep records of auger turns, moisture ratios of the wood fired, and the delivery rate per revolution for each moisture ratio.

2. New Source Performance Standards (NSPS)

   Boiler #4 is subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 CFR Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

   Since Boiler #4 fires only wood and has a maximum heat input less than 30 MMBtu/hr, it is not subject to the emission limits contained in the rule for SO_2 and PM. MRL is subject to the recordkeeping and reporting requirements of Subpart Dc including the requirement to keep monthly records of fuel use.

3. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   Boiler #4 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63, Subpart JJJJJJ). It is considered an existing biomass-fired boiler. The requirements of this subpart are covered in a separate section below.

4. Control Equipment

   Emissions of particulate matter from Boiler #2 are controlled by two multiclones, in series, with fly ash re-injection.

5. Emission Limits and Streamlining

For Boiler #4 a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.30 lb/MMBtu	06-096 CMR 103, §2(B)(4)(a)	0.30 lb/MMBtu
	8.82 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	8.82 lb/hr
PM_{10}	8.82 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	8.82 lb/hr
SO_2	0.73 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	0.73 lb/hr
NO_x	9.99 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	9.99 lb/hr
CO	17.63 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	17.63 lb/hr
VOC	0.50 lb/hr	06-096 CMR 140, BPT (A-779-77-1-A)	0.50 lb/hr
Visible Emissions	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 101, §2(B)(1)(e)	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period

6. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #4 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

7. Compliance Assurance Monitoring (CAM)

MRL's previous air emission license stated that Boiler #4 was subject to CAM for PM. However, AP-42, Table 1.6-1 (dated 9/03) lists a PM emission factor from combustion of dry wood with no control as 0.40 lb/MMBtu. This results in estimated maximum uncontrolled emissions of PM from Boiler #4 of 51.5 tpy, well below the applicability threshold of 100 tpy. Therefore, it has been determined that CAM does not apply to this equipment.

8. Operational Limits

As discussed above for Boiler #1, an Ambient Air Quality Analysis showed that, in order to comply with Maine Ambient Air Quality Standards (MAAQS) and Prevention of Significant Deterioration (PSD) Increment Standards, MRL must reduce the firing of Boiler #1 to 20% capacity or less, on a 24-hour basis, when Boiler #1 and Boiler #4 are fired in conjunction, except during periods of startup and shutdown when operations overlap is necessary.

9. Periodic Monitoring

MRL shall monitor and record the following periodic monitors for Boiler #4 and its associated air pollution control equipment.

a. Tons of wood fired in Boiler #4 on a monthly and 12-month rolling total basis based on auger rotations.
b. Ratio of dry to wet wood fired in Boiler #4 on a daily basis.
c. Delivery rate (lbs of wood per auger revolution) for each moisture ratio.
d. Records of all multiclone monthly inspections and any maintenance activities performed.

10. Parameter Monitors

There are no Parameter Monitors required for Boiler #4.

11. CEMS and COMS

There are no continuous emission monitoring systems (CEMS) or continuous opacity monitoring systems (COMS) required for Boiler #4.

J. NESHAP 40 CFR Part 63, Subpart JJJJJJ

Boilers #1, #2, and #4 are subject to 40 CFR Part 63, Subpart JJJJJJ. Notification forms and additional rule information can be found on the following website: http://www.epa.gov/ttn/atw/boiler/boilerpg.html.

1. Compliance Dates, Notifications, and Work Practice Requirements

a. Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

b. Boiler Tune-Up Program

(1) A boiler tune-up program shall be implemented.
[40 CFR Part 63.11196(a)(1)]

(2) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	**Tune-Up Frequency**
Existing Biomass fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
Boilers with less frequent tune up requirements	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity <5 MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

(3) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

(i) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection or 72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers.
[40 CFR Part 63.11223(b)(1)]

(ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]

(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection or

72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]

(iv) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]

(v) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]

(vi) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

(4) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

(i) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;

(ii) A description of any corrective actions taken as part of the tune-up of the boiler; and

(iii) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

[40 CFR §63.11223(b)(6)]

(5) After conducting the initial boiler tune-up, a Notification of Compliance Status was to have been submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

c. Compliance Report:

A compliance report shall be prepared by March 1st biennially or every five years (depending on the tune-up schedule) which covers the previous two (or five) calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report

must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §63.11225(b)]

(1) Company name and address;

(2) A statement of whether the source has complied with all the relevant requirements of this Subpart;

(3) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;

(4) The following certifications, as applicable:

(i) "This facility complies with the requirements in 40 CFR §63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."

(ii) "No secondary materials that are solid waste were combusted in any affected unit."

(iii) "This facility complies with the requirement in 40 CFR §§63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR §63.11223(b)."

d. Energy Assessment

Boilers #1 and #4 are subject to the energy assessment requirement as follows:

(1) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(3)]

(2) The energy assessment was required to include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boilers and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4)]

(3) A Notification of Compliance Status was required to be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

2. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJJ including the following [40 CFR Part 63.11225(c)]:

a. Copies of notifications and reports with supporting compliance documentation;
b. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review.

EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [63.1125(a)(4)(vi)]

K. Generator #1

MRL operates one emergency generator, Generator #1. The emergency generator is a stationary generator set with the gen set consisting of an engine and an electrical generator. Generator #1 uses a John Deere 6081H Power Tech engine which, was manufactured on 4/3/06 and installed in 2010. The generator engine has a maximum heat input capacity of 1.9 MMBtu/hr and fires distillate fuel with a maximum sulfur content of 0.0015% by weight.

Generator #1 was previously considered an insignificant activity per the appendices to 06-096 Code of Maine Rules (CMR) 140. However, changes to this rule removed this exemption and the generator is being added to this license through a Part 70 minor modification.

1. New Source Performance Standards (NSPS)

The federal regulation 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion*

Engines (CI ICE) is applicable to Generator #1 since it was ordered after July 11, 2005 and manufactured after April 1, 2006. By meeting the requirements of Subpart IIII, the unit also meets the requirements found in the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ.

a. Emergency Definition:

Emergency stationary ICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

(1) The stationary ICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, etc. There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) Paragraph (1) above notwithstanding, the emergency stationary ICE may be operated for any combination of the purposes specified below for a maximum of 100 hours per calendar year:

(i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii)Periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Paragraphs (1) and (2) above notwithstanding, emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, and periods of voltage deviation or low frequency, as provided in paragraph (2) above.

The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except if the following conditions are met:

(i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(ii) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(iv) The power is provided only to the facility itself or to support the local transmission and distribution system.

(v) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[40 CFR §60.4211(f) and §60.4219]

b. 40 CFR Part 60, Subpart IIII Requirements:

(1) Ultra-Low Sulfur Diesel Requirement
The diesel fuel fired in Generator #1 shall not exceed 15 ppm sulfur (0.0015% sulfur). [40 CFR §60.4207(b)]

(2) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on Generator #1. [40 CFR §60.4209(a)]

(3) Operation and Maintenance Requirement
Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by facility that are approved by the engine manufacturer. MRL may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

(4) Annual Time Limit for Maintenance and Testing
Generator #1 shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §60.4211(f)(3)(i) are met). [40 CFR §60.4211(f)]

(5) Initial Notification Requirement
No initial notification is required for emergency engines. [40 CFR §60.4214(b)]

(6) Recordkeeping
MRL shall keep records that include maintenance conducted on Generator #1 and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the engines are operated during a period of demand response or deviation from standard voltage or frequency, or to supply power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), MRL shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR §60.4214(b)]

(7) Annual Reporting Requirements for Demand Response Availability
If MRL operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), the facility shall submit an annual report containing the information in §60.4214(d)(1)(i) through (vii). The first annual report must cover the

calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100 (OES04-2)
Boston, MA 02109-3912
Attn: Air Compliance Clerk

[40 CFR §60.4214(d)]

2. Emission Limits and Streamlining

For Generator #1, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.23 lb/hr	06-096 CMR 140, BPT	0.23 lb/hr
PM_{10}	0.23 lb/hr	06-096 CMR 140, BPT	0.23 lb/hr
SO_2	negligible (based on 0.0015% S limit, by weight)	06-096 CMR 140, BPT	negligible (based on 0.0015% S limit, by weight)
NO_x	8.51 lb/hr	06-096 CMR 140, BPT	8.51 lb/hr
CO	1.83 lb/hr	06-096 CMR 140, BPT	1.83 lb/hr
VOC	0.68 lb/hr	06-096 CMR 140, BPT	0.68 lb/hr
Visible Emissions	20% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 101, §(2)(B)(1)(d)	20% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period

Table Notes: % S = percent fuel sulfur, by weight

3. Emission Limit Compliance Methods

   Compliance with the emission limits associated with Generator #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

4. Periodic Monitoring

   MRL shall monitor and record the following periodic monitors for Generator #1.

   a. Hours of operating time on a calendar year basis.
   b. Log of the reason for all operating time as it occurs.
   c. Records of all maintenance conducted.
   d. Sulfur content of the distillate fuel fired based on fuel receipts from the supplier.

5. Parameter Monitors

   There are no Parameter Monitors required for Generator #1.

6. CEMS and COMS

   There are no CEMS or COMS required for Generator #1.

L. Drying Kilns

MRL utilizes Kilns #1, #2, and #3 to dry lumber before sale. MRL predominantly dries spruce and fir. Air emission license A-779-71-B-M established a kiln throughput restriction of 98 MMBF/yr. Using a factor developed by the University of Maine of 1.283 pounds of VOC released in the kiln drying process for every 1,000 BF of lumber dried, MRL is restricted to an annual VOC emission limit from kiln operations of no greater than 62.9 tons of VOC per year based on a 12-month rolling total.

Periodic Monitoring

MRL shall record the quantity of wood dried in the kilns on a monthly and 12-month rolling total basis.

M. Wood Chip and Sawdust Handling

MRL utilizes a conveyor belt system to transfer wood chips from the sawmill to the chip loading storage building where the chips are loaded by bucket loader

onto trucks to be transferred to customers. Bark removed from the logs prior to processing is transferred by a drag chain conveyor system from the sawmill to a concrete bark storage pad where it is transferred by bucket loader to trucks for transfer to various markets.

MRL utilizes blower systems to transfer sawdust from the sawmill to the sawdust storage shed and to transfer planer shavings and planer sawdust to the boiler fuel silo. A process cyclone is located at the top of the boiler fuel storage silo.

1. Emission Limits and Streamlining
   For the general process emissions from the wood chip and sawdust handling systems, which include the wood chip and sawdust transfer systems (blower systems and conveyor systems), the dust cyclone, and chip and dust collection buildings and silo, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
Visible Emissions	20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block avg in a 1-hr period	06-096 CMR 101, §2(B)(3)(d)	20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block avg in a 1-hr period

2. Periodic Monitoring

   MRL shall record the following periodic monitors for the cyclone:

   a. Records of monthly inspections of the cyclone.
   b. Records of all cyclone maintenance activities.

N. Facility Annual Emissions

1. Total Annual Emissions

   MRL is licensed for the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on the following:

   - Operating each of the boilers for 8760 hr/year
   - Operating Generator #1 for 100 hr/year
   - A kiln throughput of 98 MMBF/year

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boiler #1	20.1	20.1	1.7	32.8	40.2	2.6
Boiler #2	5.9	5.9	0.5	4.3	11.8	0.8
Boiler #4	38.6	38.6	3.2	43.8	77.3	2.2
Generator #1	–	–	–	0.4	0.1	–
Kilns	–	–	–	–	–	62.9
Total TPY	**64.6**	**64.6**	**5.4**	**81.3**	**129.4**	**68.5**

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 CFR Part 52, Subpart A, §52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

The quantity of CO_2e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's fuel use limits;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*; and
- global warming potentials contained in 40 CFR Part 98.

No additional licensing actions to address GHG emissions are required at this time.

III. AMBIENT AIR QUALITY ANALYSIS

MRL previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-779-77-1-A issued on 9/30/08). An additional ambient air quality analysis is not required for this Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards; and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-779-70-D-R/A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to MRL pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 or 115 have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such, the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and specific condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD STATEMENTS

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [06-096 CMR 140]

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 CMR 140]

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 140]

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [06-096 CMR 140]

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 140]

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application.

Permit Shield Table

Source	Citation	Description	Basis for Determination
Kilns	06-096 CMR 134	VOC RACT	Exempt per 06-096 CMR 134, Section (1)(C)(6)
Boilers #1, #2 & #4	06-096 CMR 134	VOC RACT	Exempt per 06-096 CMR 134, Section (1)(C)(4)
Boilers #1, #2 & #4	06-096 CMR 138	NO_x RACT	Facility is limited to less than 100 tpy for NO_x
Boilers #1, #2 & #4	06-096 CMR 145	NO_x Control Program	Maximum heat input for each boiler less than 250 MMBtu/hr
Boilers #1, #2 & #4	40 CFR 60, Subpart D	NSPS for Fossil-Fuel-Fired Steam Generators	Maximum heat input for each boiler less than 250 MMBtu/hr
Boilers #1, #2 & #4	40 CFR 60, Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	Maximum heat input for each boiler less than 100 MMBtu/hr
Boilers #1 & #2	40 CFR 60, Subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	Each of these boilers commenced construction prior to June 9, 1989.
Boilers #1, #2 & #4	40 CFR Part 63, Subpart DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP.
Facility	40 CFR Part 64	Compliance Assurance Monitoring	Facility does not have equipment that meets all applicability requirements
Facility	40 CFR Part 98	Mandatory Greenhouse Gas Reporting	Facility does not contain any source category listed in Tables A-3 or A-4 of the rule and facility does not have the potential to emit more than 25,000 metric tons of CO_{2e}.

[06-096 CMR 140]

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the

original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 CMR 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.
[06-096 CMR 140]

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 CMR 140]

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S.A. §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140. [06-096 CMR 140]

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 140]

Enforceable by State-only

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S.A. §353-A.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 140]
Enforceable by State-only

(6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 CMR 140]

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 CMR 140]

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

2. to demonstrate compliance with the applicable emission standards; or

3. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 140] **Enforceable by State-only**

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 140] **Enforceable by State-only**

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 M.R.S.A. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

[06-096 CMR 140]

(11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 140]

(12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 CMR 140]

(13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
B. The compliance status;
C. Whether compliance was continuous or intermittent;
D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
E. Such other facts as the Department may require to determine the compliance status of the source.

[06-096 CMR 140]

SPECIFIC CONDITIONS

(14) **Boiler #1**

A. Boiler #1 is licensed to fire wood. [06-096 CMR 140, BPT]

B. Boiler #1 Emission Limits

1. Emissions from Boiler #1 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.30	06-096 CMR 103, §2(B)(4)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	4.59	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
PM_{10}	4.59	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
SO_2	0.38	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
NO_x	7.50	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
CO	9.18	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
VOC	0.58	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable

2. Visible emissions from Boiler #1 shall not exceed 30% opacity on a six (6) minute block average basis, except no more than two (2) six minute block averages in a 3-hour block period. [06-096 CMR 101, §2(B)(1)(e)]

C. When operating Boiler #1 in conjunction with Boiler #4, MRL shall limit the firing of Boiler #1 to 20% of its maximum capacity on a 24-hour basis, except during periods of startup and shutdown. Compliance with the 20% capacity limit shall be demonstrated by limiting fuel use in Boiler #1 to 9,600 lb/day (4.8 ton/day). [06-096 CMR 140, BPT (A-779-77-1-A)]

D. Control Equipment

1. MRL shall control particulate matter emissions from Boiler #1 by use of a cyclone with fly ash re-injection. [06-096 CMR 140, BPT]
2. MRL shall inspect the cyclone at least once per month. [06-096 CMR 140, BPT]

E. Periodic Monitoring

MRL shall monitor and record the following periodic monitors for Boiler #1 and its associated air pollution control equipment:

1. Tons of wood fired in Boiler #1 on a monthly and 12-month rolling total basis based on auger rotations. [06-096 CMR 140, BPT]
2. Records of all cyclone monthly inspections and any maintenance activities performed. [06-096 CMR 140, BPT]
3. For periods when Boiler #1 is operated in conjunction with Boiler #4, records of the daily auger revolutions for the feed to Boiler #1 (excluding periods of startup and shutdown) and the resulting calculated quantity of fuel consumed in lb/day (or tons/day).

(15) **Boiler #2**

A. Boiler #2 is licensed to fire wood/bark. [06-096 CMR 140, BPT]

B. Boiler #2 Emission Limits

1. Emissions from Boiler #2 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.30	06-096 CMR 103, §2(B)(4)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	1.35	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
PM_{10}	1.35	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
SO_2	0.11	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
NO_x	0.99	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
CO	2.70	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
VOC	0.17	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable

2. Visible emissions from Boiler #2 shall not exceed 30% opacity on a six (6) minute block average basis, except no more than two (2) six minute block averages in a 3-hour block period. [06-096 CMR 101, §2(B)(1)(e)]

C. Prior to operating Boiler #2, MRL shall re-install Stack #2 to a minimum AGL height of 90 feet. [06-096 CMR 140, BPT]

D. Periodic Monitoring

MRL shall monitor and record the following periodic monitors for Boiler #2 and its associated air pollution control equipment:

1. Records of operation of Boiler #2 including the dates and times of operation. [06-096 CMR 140, BPT]
2. Tons of wood fired in Boiler #2 on a monthly and 12-month rolling total basis based on the hours of operation and a fuel usage of 0.5 ton/hour. [06-096 CMR 140, BPT]

(16) **Boiler #4**

A. Boiler #4 is licensed to fire wood. [06-096 CMR 140, BPT]

B. Boiler #4 Emission Limits

1. Emissions from Boiler #4 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.30	06-096 CMR 103, §2(B)(4)(a)	Federally Enforcable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	8.82	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
PM_{10}	8.82	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
SO_2	0.73	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
NO_x	9.99	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
CO	17.63	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable
VOC	0.50	06-096 CMR 140, BPT (A-779-77-1-A)	Federally Enforceable

2. Visible emissions from Boiler #4 shall not exceed 30% opacity on a six (6) minute block average basis, except no more than two (2) six minute block averages in a 3-hour block period. [06-096 CMR 101, §2(B)(1)(e)]

C. Control Equipment

1. MRL shall control particulate matter emissions from Boiler #4 by use of two multiclones in series with fly ash re-injection. [06-096 CMR 140, BPT]
2. MRL shall inspect the multiclones at least once per month. [06-096 CMR 140, BPT]

D. Periodic Monitoring

MRL shall monitor and record the following periodic monitors for Boiler #4 and its associated air pollution control equipment:

1. Tons of wood fired in Boiler #4 on a monthly and 12-month rolling total basis based on auger rotations. [06-096 CMR 140, BPT]
2. Ratio of dry to wet wood fired in Boiler #4 on a daily basis. [06-096 CMR 140, BPT]
3. Delivery rate (lbs of wood per auger revolution) for each moisture ratio. [06-096 CMR 140, BPT]
4. Records of all multiclone monthly inspections and any maintenance activities performed. [06-096 CMR 140, BPT]

(15) **40 CFR Part 63, Subpart JJJJJJ Requirements for Boilers #1, #2, and #4**

A. The facility shall implement a boiler tune-up program. [40 CFR Part 63.11223]

1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	**Tune-Up Frequency**
Existing Biomass fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
Boilers with less frequent tune up requirements	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity <5 MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

2. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
   a. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection or 72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]
   b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
   c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection or 72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
   d. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
   e. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
   f. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

3. Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:
   a. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
   b. A description of any corrective actions taken as part of the tune-up of the boiler; and
   c. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

   [40 CFR §63.11223(b)(6)]

B. Compliance Report

A compliance report shall be prepared by March 1st biennially or every five years (depending on the tune-up schedule) which covers the previous two (or five) calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §63.11225(b)]

1. Company name and address;
2. A statement of whether the source has complied with all the relevant requirements of this Subpart;
3. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
4. The following certifications, as applicable:
   a. "This facility complies with the requirements in 40 CFR §63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
   b. "No secondary materials that are solid waste were combusted in any affected unit."
   c. "This facility complies with the requirement in 40 CFR §§63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR §63.11223(b)."

C. Energy Assessment

1. A one-time energy assessment was required to be performed by a qualified energy assessor on Boilers #1 and #4. [40 CFR Part 63.11196(a)(3)]
2. The energy assessment was required to include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR 63, Table 2(4)]

D. Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJJ including the following [40 CFR Part 63.11225(c)]:
   1. Copies of notifications and reports with supporting compliance documentation;
   2. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
   3. Records of the occurrence and duration of each malfunction of each applicable boiler; and
   4. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

   Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [63.1125(a)(4)(vi)]

(16) **Generator #1**

A. Generator #1 is licensed to fire distillate fuel. [06-096 CMR 140, BPT]

B. Emissions shall not exceed the following limits [06-096 CMR 115, BPT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	0.23	0.23	neg	8.51	1.83	0.68

C. Visible emissions from Generator #1 shall not exceed 20% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period. [06-096 CMR 101, §2(B)(1)(d)]

D. Generator #1 shall meet the applicable requirements of 40 CFR Part 60, Subpart IIII, including the following:

   1. Ultra-Low Sulfur Diesel Fuel
      The diesel fuel fired in Generator #1 shall not exceed 15 ppm sulfur (0.0015% sulfur). Compliance with the fuel sulfur content limit shall be based on fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [40 CFR §60.4207(b) and 06-096 CMR 115]

2. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on Generator #1. [40 CFR §60.4209(a)]

3. Annual Time Limit for Maintenance and Testing
   a. Generator #1 shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §60.4211(f)(3)(i) are met). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or a written log) of all engine operating hours. [40 CFR §60.4211(f) and 06-096 CMR 115]

   b. MRL shall keep records that include maintenance conducted on Generator #1 and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If Generator #1 is operated during a period of demand response or deviation from standard voltage or frequency, or to supply power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), the MRL shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

4. Operation and Maintenance
   Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by the facility that are approved by the engine manufacturer. MRL may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

5. Annual Reporting for Demand Response Availability Over 15 Hours Per Year (for engines greater than 100 brake hp)
   If MRL operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), the facility shall submit an

annual report containing the information in §60.4214(d)(1)(i) through (vii). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100 (OES04-2)
Boston, MA 02109-3912
Attn: Air Compliance Clerk

[40 CFR §60.4214(d)]

(17) **Drying Kilns**

A. MRL shall be limited to drying a total of 98 MMBF of lumber per year in the facility's drying kilns based on a 12-month rolling total. [06-096 CMR 140, BPT (A-779-71-B-M)]

B. As a periodic monitoring requirement, MRL shall maintain records indicating the quantity of wood dried in BF. The kiln production records shall be maintained on a monthly and a 12-month rolling total basis. [06-096 CMR 140, BPT (A-779-77-1-A)]

C. Prior to drying any species of wood other than spruce and fir in the kilns, MRL shall contact the Department for approval of an alternative emission factor appropriate for the species the facility intends to dry. [06-096 CMR 140, BPT (A-779-77-1-A)]

(18) **Wood Chip and Sawdust Handling System**

A. Visible emissions from the wood chip and wood dust handling systems, including the wood chip and sawdust transfer systems (blower systems and conveyor systems), the dust cyclone, and chip and dust collection buildings and silo, shall not exceed an opacity of 20% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. [06-096 CMR 101, §2(B)(3)(d)]

B. MRL shall establish a system of maintenance, inspection and repair for the wood chip and wood dust handling system, which shall include a monthly inspection of the system. [06-096 CMR 140, BPT (A-779-77-1-A)]

C. Periodic Monitoring

MRL shall monitor and record the following periodic monitors for the cyclones:

1. Records of monthly inspections of each cyclone. [06-096 CMR 140, BPT (A-779-77-1-A)]
2. Records of all cyclone maintenance activities. [06-096 CMR 140, BPT (A-779-77-1-A)]

(19) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20 percent, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour. [06-096 CMR 101]

(20) **Semiannual Reporting** [06-096 CMR 140]

A. The licensee shall submit to the Bureau of Air Quality semiannual reports which are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.
B. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date.
C. Each semiannual report shall include a summary of the periodic monitoring required by this license.
D. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(21) **Annual Compliance Certification**

MRL shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31 of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the

Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 CMR 140]

(22) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted by the date specified in 06-096 CMR 137.

(23) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
06-096 CMR 102	Open Burning	-
06-096 CMR 109	Emergency Episode Regulation	-
06-096 CMR 110	Ambient Air Quality Standard	-
06-096 CMR 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(24) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs.
[40 CFR, Part 82, Subpart F]

(25) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Facility shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(26) **Expiration of a Part 70 license**

A. MRL shall submit a complete Part 70 renewal application at least 6 months prior, but no more than 18 months prior, to the expiration of this air license.

B. Pursuant to Title 5 M.R.S.A. §10002, and 06-096 CMR 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 CMR 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

(27) **New Source Review**

MRL is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emissions license and the NSR requirements remain in effect even if this 06-096 CMR 140 Air Emissions License, A-779-70-D-R/A, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 18 DAY OF November , 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for
AVERY T. DAY, ACTING COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

[Note: If a complete renewal application as determined by the Department, is submitted at least 6 months prior to expiration but no earlier than 18 months, then pursuant to Title 5 M.R.S.A. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the renewal of the Part 70 license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 11/4/14
Date of application acceptance: 11/10/14

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

Filed
NOV 13 2015
State of Maine
Board of Environmental Protection